

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CAROL LEDERMAN, AMY LEDERMAN 1986
TRUST, JUDY LEDERMAN 1986 TRUST, AMY
L. VERSCHLEISER 1998 TRUST, JUDY
LEDERMAN 1998 TRUST, AMY
VERSCHLEISER and JUDY LEDERMAN,

Defendants.

Adv. Pro. No. 10-05440 (SMB)

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL OF
ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), by and through his counsel, Baker & Hostetler LLP, and defendants Carol Lederman, Amy Lederman 1986 Trust, Judy Lederman 1986 Trust, Amy L. Verschleiser 1998 Trust, Judy Lederman 1998 Trust, Amy Verschleiser and Judy Kloner (named as a defendant as Judy Lederman) (collectively, “Defendants”), by and through their counsel, Frejka PLLC (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On December 2, 2010, the Trustee filed and served the Complaint in this adversary proceeding against CAJ Associates, L.P. (“CAJ”) and Carol Lederman (ECF No. 1).

2. On January 16, 2014, a Stipulation for Substitution of Defendants and Order was entered in this adversary proceeding in connection with the dissolution of CAJ substituting Defendants as defendants in the adversary proceeding, with Defendants deemed to be, and to be treated as, initial transferees, with the Complaint deemed so amended (ECF No. 28).

3. On January 17, 2014, Defendants served an answer on the Trustee (ECF No. 30).

4. Pursuant to the Settlement Procedures Order, entered by this Court on November 12, 2010 [ECF No. 3181 in Adv. Pro. No. 08-01789 (SMB)], the Parties entered into a Settlement Agreement and Release on December 18, 2015.

5. Pursuant to the terms of the Settlement Agreement and Release, and in accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee’s claims against Defendants in the above-captioned adversary proceeding and dismissing the

adversary proceeding with prejudice.

6. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

7. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: January 5, 2016

Of Counsel:

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Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

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Attorneys for Defendants

SO ORDERED:

Dated: January 6, 2016
New York, New York

/s/Stuart M. Bernstein
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE